CONFIDENTIAL

Inspection Report
U.S. Environmental Protection Agency
Region 9
Toxics and Waste Management Division
Field Operations Branch

Purpose: RCRA Investigation

Facility Name: Whittaker Corporation Bermite Division

Street: 22116 West Soledad Canyon Road

City: Saugus State: CA Zip Code: 91350

EPA ID number: CAD064573108

Report number: R(85)E217

Date of Investigation: June 25, 1985

EPA Inspector(s): Barry Cofer, Field Investigator
Daniel Shane, Field Investigator
William Weis, Field Investigator

State Inspector(s): Baron J. Peeler, Waste Management Specialist
California Department of Health Services
(213) 620-2380

Facility Representatives: Thomas J. Bloom
Manager, Environmental Health & Safety
(213) 629-1403

Rodney (Rod) Muse, C.C.P.
Vice President, Human Resources

John Peloquin
Corporate Hygenist & Environmental Engineer
(303) 366-8469

John Pierson
Environmental Engineer

Report Prepared By: Barry Cofer

Form A - Interim Status Standards for Facilities that Treat, Store or Dispose of Hazardous Waste

## I. General Information

(A) Operator: Bermite Division of Whittaker Corporation

Street: 22116 West Soledad Canyon Road

City: Saugus State: CA Zip Code: 91350

(B) Owner: Whittaker Corporation

Street: 10880 Wilshire Boulevard

City: Los Angeles State: CA Zip Code: 90024

(C) Site Activity:

| | | | |
|---|---|---|---|
| X | Generation: Complete Form B | | |
| | Transportation: Complete Form C | | |
| | **Storage:** | | **Disposal:** |
| X | Container (S01) | | Injection Well (D79) |
| | Tank (S02) | | Landfill (D80) |
| | Waste Pile (S03) | | Land Application (D81) |
| X | Surface Impoundment (S04) | | Ocean Disposal (D82) |
| | | | Surface Impoundment (D83) |

| | Treatment: | Process Code: | Design Capacity: |
|---|---|---|---|
| | | T01 | 200 U |
| X | Tank (T01) | S01 | 46,695 G |
| | | S04 | 100,000 G |
| | Surface Impoundment (T02) | | |
| | | | |
| | Incinerator (T03) | | |
| | | | |
| X | Other (T04): Open Burning | T04 | 0.375 D |

I. General Information: Continued

(D) Nature of Business:

The Bermite Division of the Whittaker Corporation produces at their Saugus facility explosives, propellants, flare, and igniter products under contract to the Department of Defense.

(E) Description of Facility and Processes:

Site operations are spread over a large area of semi-rural land, with waste operations remote from each other and the property lines. Access is rigidly controlled, with entry allowed only through a single manned gate.

Saugus contains the following hazardous waste management units:
- Lead Azide Wash Water Treatment Unit
- Lead Azide Wash Water Surface Impoundment
- East Fork Detonation Range
- Portable Waste Explosives Storage Magazines
- Waste Pyrotechnic Storage Magazine
- Drum Storage Unit (by Building 317)
- Future Drum Storage Unit
- Open Burning Area
- Surface Impoundment (Closed 1983, waste solvents, near Bldg. 317)
- Surface Impoundment (Closed 1983, stabilized red phosphorus)
- Storage Tank Farm (for storage of less than 90 days)

Facility representatives, using their own knowledge of site processes and the Operating Records, could not produce some necessary information on materials handled on site, wastes generated, and waste management units, as discussed below.

A listing of all manufacturing processes and wastes generated on site was requested and later transmitted. (See Attachment #4, stamped Confidential.)

I requested, and received on the dates indicated in the list of attachments, RCRA required documents that could not be produced at the time of inspection: The Waste Analysis Plan; Transmittal letters for the Contingency Plan to local and state organizations; and copies of the Inspection Log for the Tank Farm (listed as storage for less than 90 days).

The Bermite Division is heavily dependent on Department of Defense contracts, and waste streams and unit use change with variations in these contracts. At our suggestion, a Revised Part A has been submitted that reflects the current and expected future operations that occur on site. This Part A, and its appendices, have been assembled as Attachment #2 for this report.

Clarification of several other items found in the Operating Record, such as a proposed contractor groundwater study and results of internal company waste inspections and written concerns were also requested and transmitted. See cover letter, Attachment #5.

I. General Information: continued

The documents, records, and the revised Part A to be transmitted were discussed and clarified in phone conversations with Steven Jones of Jeffer, Mangels, and Butler on July 24, 1985 and subsequent occasions.

Three distinct hazardous waste impoundment units have been closed or are out of operation at the facility, and their activities consolidated into a Tank Farm facility near Building 317.

The Red Phosphorus Stabilizing lagoon was closed in late 1983. A concrete pad has been constructed over the area that the revised Part A photos (Attachment #2, photo appendix, picture number #6, page 4) identify as the future site of the drum storage area.

A copy of the closure plan for the phosphorus stabilizing lagoon that was submitted to DOHS prior to closing is Attachment #8A. This plan was discussed with the EPA and other agencies prior to implementation, but no certification of closure by an independent registered engineer to show the closure plan for the impoundment was followed could be produced. Attachment #8B contains the initial and revised results of analysis of the underlying soil of the lagoon after closure.

The reactives and spent solvents surface impoundment was also closed in late 1983, and covered when concrete pad and tanks of the Tank Farm unit was built on top of the site. No discrete closure plan or underlying soil analysis results were found in EPA files or facility operating records for this impoundment. No certification of closure could be produced.

Pages two to four of the site transmittal letter of 8/2/85 to EPA in Attachment #5 is the site's response to our request for closure certification documents, and details their closure plan approvals and closure activities for the phosphorus stabilizing and spent solvent units.

The lead azide neutralization process consists of a three concrete tank flow system, reported as not in use. Standing water was observed in the tanks, with deposits crusted on the sides. The surface impoundment, now replaced by the tank farm unit, has vegetation growing on it (see photos, Attachment #1, page 1, photo A) and has not been used in some time. Facility could not produce any closure plans, closure documentation, or soils analysis for the surface impoundment upon request. The area is posted as a hazardous waste area. Plastic crates with reagents in containers were found stored inside the compound fence. See photos, Attachment #1, page 1, B.

The facility correspondence file and site reports indicate that the closed surface impoundments were active after the November 19, 1981 effective date for groundwater monitoring implementation, and remained usable until closure of the impoundments sometime in late 1983.

Although the revised Part A (Attachment #2) includes a map of wells within a quarter-mile of the site, none of the wells listed are located within the site boundary. The facility reported no groundwater monitoring program, and no groundwater monitoring data could be produced.

The storage tanks that replaced the lagoons are listed in site documents as less than ninety day storage units, and thus exempt from RCRA permitting requirements. The Tank Inspection Logs (Attachment #5, "Exhibit B") from January 21, 1985 to June 26,1985 show placement of wastes into the tanks, but no withdrawal dates for disposal. Daily tank levels and the accumulation and disposal dates for all wastes generated and stored in tanks should be fully documented if the site wishes to assert the ninety day turn-around exemption.

As noted above and in the inspection checklist, no Waste Analysis Plan (W.A.P.) could be produced from the Operating Record and only sparse analysis results were documented. At that time, we were informed the W.A.P. was kept by a site chemist. A copy of the W.A.P. was transmitted to EPA on August 2, 1985. A revised and much more detailed W.A.P. was transmitted on August 27, 1985. The W.A.P. checklist portion (III, page 6) was completed as if the most recent W.A.P. was already in effect at the time of inspection.

The facility uses open burning and detonation as pyrotechnic, explosive, and propellants (PEP) treatment. Detonation is used for offspec or excess explosives. The facility transmittal letter of 8/2/85 (Attachment #5, page 4) states in response to our question during inspection that the East Fork Detonation Area was last used 10/18/84.

The PEP wastes and PEP contaminated wastes are stored in concrete or sheet metal bunkers and spread on pans, rails, or placed in the burn cage for ignition (Attachment #1, photos pages 5-8). Residue reactive solids from drum bottoms and filtered from drummed waste solvents are absorbed with muslin sheets, spread on pans to dry, and also treated by open burning (Attachment #1, photos page 8, A-B).

The most recent W.A.P. accounts for analysis for residual ash from the open burning process, and notes that "the potential for combustion and/or detonation of Bermite's solid, reactive wastes precludes the safe sampling and analysis of these materials, at least on a routine basis" (revised W.A.P., Attachment #3, part 3.1).

The facility's Environmental Protection Manual notes that some materials give off toxic fumes when being destroyed by burning and require SCBA's or equivalents for protection (Attachment #6, Section 8.4.5).

I. General Information: continued

The door for the concrete bunker used for "wet" PEP material storage was off its hinges during the inspection (see photo page #7, B). The photos for the revised Part A (Attachment #2, Part A Appendix, photo 22, page 6) dated August 27, 1985 shows this door back on the bunker, and a hazardous waste warning sign posted.

Copies of manifests for waste shipped by the site in October 1983 but not signed by by the disposal facility and returned were collected during inspection (Attachment #7). Copies of these manifests signed by one Kevin Terrio listing Chemical Waste Management's Kettleman City facility RCRA identification number were transmitted on 8/28/85, but still bear no entries in the designated TSD block of the manifests or notes in the discrepancy block (see Part 3 of Attachment #5). An Exception Report as required under 40 CFR 262.43 was not received.

The facility states they have taken steps to increase accountability for manifests (Attachment #5, paragraph #8), and all manifests included in 1984-85 Annual Report (Attachment #9) include this information.

The present Drum Storage Area has open sides, a roof and a bermless concrete pad. Drums in the storage area bearing labels other than the reported actual drum contents were noted during inspection (See report photo, Attachment #1, page 3, B). Trash drums elsewhere on site also bore their original labels (Attachment #1, page 1, photo B).

I. General Information: - Continued

(F) Report Attachments

1. Photographs

2. Transmittal letter from facility dated 08/06/85
Revised RCRA Part A Application dated 08/06/85,
Including photographic essay dated 08/27/85

3. Transmittal letter from Meredith/Boli & Assoc., Inc.
dated 08/27/85
Revised Waste Analysis Plan (WAP) dated 08/27/85

4. List of Manufacturing Processes and Waste dated 08/06/85
stamped Confidential

5. Transmittal letter dated 08/02/85 from Facility
"Exhibit A" W.A.P. (previous version)
"Exhibit B" Tank Inspection Log for 1/21/85 through 6/26/85
"Exhibit C" Manifest #8264545-#8264549

6. Transmittal Letter from facility dated 07/01/85
Copies of Contingency Plan Transmittals (6) dated 07/01/85
Environmental Protection Manual issued February 1983,
incorporating Emergency and Disaster Plan revised April 1985

7. Inspection Documents collected by EPA on 06/25/85

8a. Transmittal letter by facility to CA DOHS-LA dated 9/9/83 and
closure plan for phosphorus stabilizing area

8b. Hager Laboratories analysis report of 11/18/83, and corrected
report of 11/21/83 for phosphorus stabilizing lagoon

9. Annual Hazardous Waste Report dated 3/20/85 for 3/1/84 thru 2/28/85
Closure Plan dated 3/20/84
Annual Report for 3/1/83 thru 2/29/84

10. DOHS letter to facility of 1/19/83 on ISD corrective measures

11. Application for DOHS Operating Permit(s) dated 2/24/81 and 1/25/82
for Open Burning and Detonation

12. RCRA Part A Application of 10/31/80, as Revised 3/24/81
RCRA Part A hazardous inventory list transmitted 10/28/82 as
revised 9/22/82
Notification of Hazardous Waste Activity dated 08/11/80

## II. Interim Status:
(Part 270 Subpart G)

| | Yes | No | Comments |
|---|---|---|---|
| (A) Qualifying For Interim Status: | | | |
| 1. For the existing facility to be treated as having been issued a permit, the facility must have: | | | |
| a. Submitted a notification of H.W. activity (270.70a.1)? | ✓ | | 8/11/80. ATTACHMENT #12 |
| b. Submitted Part A of the permit application (270.70a.2)? | ✓ | | 10/31/80, AMENDED 3/23/81, 8/5/81, 10/23/8 SEE ATTACHMENT #12 REVISED 8/6/85, SEE ATTACHMENT #2 |
| c. Achieved compliance with RCRA interim status standards (270.70b)? | | | SEE checklist |
| (B) Operating During Interim Status: | | | |
| 1. Has the facility complied with the following restrictions: | | | |
| a. Has not treated, stored or disposed of H.W. not specified in the Part A (270.71a.1)? | ✓ | | |
| b. Has not employed processes not specified in the Part A (270.71a.2)? | | ✓ | TO4, OPEN BURNING & DETONATION ADDED TO CURRENT PART A. DOHS PERM FOR TO4 APPLIED FOR 2/24/81, 1/25/82. SEE ATTACHMENTS #2, #11, #12 |
| c. Has not exceeded design capacities specified in the Part A (270.71a.3)? | | | NOT INSPECTED |
| (C) Changes During Interim Status: | | | |
| 1. Has a revised Part A been submitted prior to the following changes: | | | |
| a. T/S/D of H.W. not previously identified in the Part A (270.72a)? | ✓ | | |
| b. Increases in design capacity of processes (270.72b)? | | | NOT INSPECTED |
| c. Changes in or additions to processes (270.72c)? | | ✓ | |
| d. Change in ownership (270.72d)? | | | NOT Applicable |
| 2. Have the changes made not amounted to reconstruction (270.72e)? | ✓ | | |

## III. General Facility Standards: (Part 265 Subpart B)

| | Yes | No | Comments |
|---|---|---|---|
| (A) Required Notices: | | | |
| 1. Has the RA been notified regarding the receipt of H.W. from a foreign source (265.12a)? | — | — | N/A ALL WASTES GENERATED ON SITE. |
| 2. Before transferring ownership, has the facility notified the new owners in writing of the requirements of Parts 265 and 122 (265.12b)? | — | — | N/A |
| (B) General Waste Analysis: | | | |
| 1. Has the facility obtained a detailed chemical and physical analysis of each H.W. (265.13a.1)? | ✓ | — | NEW WASTE ANALYSIS PLAN (WAP) SPECIFIES DETAILED ANALYSIS. RESULTS AVAILABLE DURING INSPECTION INDICATED ONLY OUTGOING MANIFESTED WASTES ANALYSES RECORDS WERE RETAINED. THESE RECORDS DID NOT COMPLY WITH ~~plan~~ EITHER WAP VERSION. AS ALL |
| 2. Does the analysis contain all information that must be known to properly treat, store or dispose of the H.W. (265.13a.1)? | ✓ | — | WASTE IS GENERATED ON SITE, CONTINUING PROCESSES OR OFF-SPEC PRODUCT, PROPER KNOWLEDGE FOR TREATMENT AND STORAGE IS ~~INFERRED~~, BUT NOT DOCUMENTED. INFERRED SEE ATTACHMENT #3, "A" ATTACHMENT #5. |
| 3. Does the facility have records documenting the required H.W. analysis, e.g., lab reports, published data, generator supplied data (265.13a.2)? | — | ✓ | |
| 4. Has the analysis been repeated to ensure that it is accurate and up-to-date (265.13a.3)? | — | ✓ | EXCEPT FOR ONE-TIME PCB RESULTS PRIOR TO TRANSFORMER SHIPMENT FOR DISPOSAL, ALL DATA DATED 1983. |
| 5. Is the analysis repeated when there is a change in the process (265.13a.3)? | ✓ | — | |
| 6. For off-site facilities, is the analysis repeated when the H.W. received does not match the H.W. designated on the manifest (265.13a.3)? | — | — | NOT APPLICABLE |
| 7. For off-site facilities, does the facility inspect or analyze each movement of H.W. to verify that the H.W. received matches the identity of the H.W. specified on the manifest (265.13a.4)? | — | — | N/A |

III. General Facility Standards: - Continued
(Part 265 Subpart B)

| | Yes | No | Comments |
|---|---|---|---|
| 8. Does the facility have a detailed waste analysis plan (265.13b)? | ✓ | | COULD NOT BE PRODUCED AT TIME OF INSPECTION. W.A.P. TRANSMITTED 8/2/85. REVISED W.A.P. DATED 8/27/85 USED FOR CHECKLIST. SEE ATTACHMENT #3, EXHIBIT "A" OF ATTACHMENT #5 |
| 9. Does the facility follow the procedures specified in the waste analysis plan (265.13b)? | | | NOT INSPECTED. NOT DOCUMENTED by FACILITY. |
| 10. Does the waste analysis plan contain the following elements: | | | |
| a. Parameters of analysis of each H.W. handled (265.13b.1)? | ✓ | | |
| b. Rationale for the selection of each parameter (265.13b.2)? | ✓ | | |
| c. Test methods used to obtain a representative sample of H.W. (265.13b.3)? | ✓ | | |
| d. Frequency which each analysis will be repeated (265.13b.4)? | ✓ | | ANNUALLY FOR PEP, Etc. W.A.P. p.8 |
| e. For off-site facilities, the analysis that generators have agreed to supply (265.13b.5)? | | | N/A |
| 11. For off-site facilities, does the plan specify procedures for inspection or analysis of each movement of H.W. (265.13c)? | | | N/A |
| 12. For off-site facilities, does the plan contain the following elements: | | | |
| a. Description of procedures used to identify each movement of H.W. (265.13c.1)? | | | N/A |
| b. Description of the sampling method used to obtain a representative sample of the H.W. (265.13c.2)? | | | N/A |
| (C) Security: | | | |
| 1. Do security measures include: | | | |
| a. 24-hour surveillance (265.14b.1)? | ✓ | | VERY STRINGENT SECURITY ADHERED TO. SITE ACCESS LIMITED. |

III. General Facility Standards: - Continued
(Part 265 Subpart B)

| | Yes | No | Comments |
|---|---|---|---|
| b. Artificial or natural barriers and controlled entry (265.14b.2)? | ✓ | | |
| c. Signs with the legend "Danger-Unauthorized Personnel Keep Out" posted at entrances to active portions of facility (265.14c)? | ✓ | | |
| (D) General Inspection Requirements: | | | |
| 1. Does the facility inspect for equipment malfunctions and deterioration, operator errors, and H.W. discharges (265.15a)? | ✓ | | |
| 2. Does the facility follow a written inspection schedule (265.15b.1)? | | ✓ | NO SPECIFIC SCHEDULE PRODUCED ON REQUEST. INSPECTIONS ARE PERFORMED. SEE TANK LOG, ATTACHMENT #5, "EXHIBIT B" AS EXAMPLE |
| 3. Is the schedule kept at this facility (265.15b.2)? | | ✓ | |
| 4. Does the schedule identify types of problems that are expected from malfunction, operator error, deterioration or discharges of all: (265.15b.3) | | | |
| a. monitoring equipment? | | ✓ | |
| b. safety, emergency equipment? | | ✓ | |
| c. security equipment? | | ✓ | |
| d. operating and structural equipment? | | ✓ | |
| 5. Does the schedule indicate the frequency of inspection for each item (265.15b.4)? | | ✓ | |
| 6. Does the schedule include daily inspections of loading and unloading areas (265.15b.4)? | | ✓ | |
| 7. Has the facility taken remedial action to correct the problems revealed on an inspection (265.15c)? | ✓ | | |

III. General Facility Standards: - Continued
(Part 265 Subpart B)

| | Yes | No | Comments |
|---|---|---|---|
| 8. Are inspections recorded in an inspection log (265.15d)? | ✓ | | SEE EXAMPLE, TANK LOGS IN ATTACHMENT #5, "EXHIBIT B" |
| 9. Does the log include: (265.15d) | | | |
| a. Date and time of inspection? | | ✓ | DATE, NOT TIME CONSISTENTLY |
| b. Name of inspector? | ✓ | | initials of inspector |
| c. Observations recorded? | ✓ | | |
| d. Date and nature of repairs or other remedial actions? | ✓ | | |
| 10. Are inspection records kept for at least 3 years (265.15d)? | | | NOT INSPECTED. |
| (E) Personnel Training: | | | |
| 1. Does the facility have a personnel training program (265.16a.1)? | ✓ | | |
| 2. Is it directed by a person trained in H.W. management procedures (265.16a.2)? | ✓ | | Pierson, E.E., B.A. in Environmental Science. |
| 3. Does the program include training in: (265.16a.3) | | | |
| a. Procedures for using, inspecting, repairing and replacing emergency and monitoring equipment? | ✓ | | special personnel for REPAIRING EQUIPMENT |
| b. Emergency procedures including contingency plan implementation? | ✓ | | |
| 4. Do new personnel receive required training within 6 months (265.16b)? | ✓ | | LAST SESSION MARCH, scheduled for JULY |
| 5. Do personnel take part in an annual review of the initial training (265.16c)? | ✓ | | |

III. General Facility Standards: - Continued
(Part 265 Subpart B)

| | Yes | No | Comments |
|---|---|---|---|
| 6. Do personnel training records include: (265.16d) | | | NO BY-NAME SORTED RECORDS. PERSON REPORTED MAY BE INTEGRATE INTO PERSONNEL FILES, BUT COULD NOT |
| a. Job titles? | | ✓ | PRODUCE ON REQUEST. LISTS OF |
| b. Job Descriptions? | | ✓ | ATTENDEES ATTACHED TO SOME SESSION MINUTES. Job descriptions IN |
| c. Descriptions of training? | ✓ | | ENVIRONMENTAL PROTECTION MANUAL'S |
| b. Records of training? | ✓ | | DISASTER PLAN (APPENDIX IV therein) does NOT GIVE NAMES FOR FILLED POSITIONS — SEE REPORT ATTACHMENT #6. |
| (F) Requirements For Ignitable, Reactive, Or Incompatible Wastes: | | | |
| 1. Are the following precautions taken to prevent accidental ignition or reaction: (265.17a) | | | |
| a. Separation and protection from ignition sources? | ✓ | | |
| b. No smoking signs in hazard areas? | ✓ | | SMOKING PROHIBITED EXCEPT FOR DESIGNATED AREAS. |
| 2. Is the T/S/D of ignitable, reactive and incompatible waste conducted so that it does not: (265.17b) | | | |
| a. Generate extreme heat or pressure, fire or explosion, or violent reaction? | | | N/A. EXPLOSION, BURNING USED FOR DISPOSAL. |
| b. Produce uncontrolled toxic or flammable mists, fumes, dusts or gases? | ✓ | | PART 8.4.5. OF ENVIRONMENTAL PROTECTION MANUAL (ATTACHMENT #6) STATES SOME TOXIC FUMES FROM BURNING of WASTE EXPLOSIVES, etc. CAN OCCUR. THERE WAS NO INDICATION this HAS HAPPENED ON SITE. |
| c. Damage structural integrity of H.W. containment devices? (e.g., tanks, containers, liners) | | | TANK #3 PULLED FROM SERVICE DUE TO LINER SEAMS LEAKING. CAUSE NOT IDENTIFIED |
| d. Threaten human health or the environment? | ✓ | | |

## IV. Preparedness and Prevention:
(Part 265 Subpart C)

| | | Yes | No | Comments |
|---|---|---|---|---|
| (A) | Is the facility designed, constructed, maintained, and operated to minimize the possibility of fire, explosion, or releases of H.W. or H.W. constituents to air, soil, or surface water which could threaten human health or the environment (265.31)? | ___ | ___ | N/A EXPLOSION AND FIRE ARE DISPOSAL TECHNIQUES |
| (B) | Required Equipment: | | | |
| 1. | Does the facility have the following equipment where applicable: | | | SEE CONTIGENCY PLAN 12/83 and 4/85 ATTACHMENT # 6 |
| a. | Internal communications or alarm systems (265.32a)? | ✓ | ___ | |
| b. | Telephone or 2-way radios at the scene of operation (265.32b)? | ✓ | ___ | EACH TRUCK HAS RADIO ALSO |
| c. | Portable fire extinguishers with water, foam, inert gas, dry chemical; spill control and decontamination equipment (265.32c)? | ✓ | ___ | ON EMERGENCY TRUCKS, Etc. |
| d. | Water at adequate volume and pressure or foam producing equipment or automatic sprinklers (265.32d)? | ✓ | ___ | |
| (C) | Testing And Maintenance Of Equipment: | | | |
| 1. | Does the facility test and maintain emergency equipment in operable condition (265.33)? | ✓ | ___ | EMERGENCY SAFETY VEHICLES AND FIRE TRUCKS CHECKED WEEKLY. Showers, eyewash tested on site DURING INSPECTION. |
| (D) | Access To Communications Or Alarm Systems: | | | |
| 1. | Do personnel in areas where H.W. is being handled have immediate access to these systems (265.34)? | ✓ | ___ | TWO-WAY RADIOS CARRIED |
| (E) | Required Aisle Space: | | | |
| 1. | Is there adequate aisle space for unobstructed movement of fire, spill control and decontamination equipment in an emergency (265.35)? | ✓ | ___ | |

IV. Preparedness and Prevention: - Continued
(Part 265 Subpart C)

| | Yes | No | Comments |
|---|---|---|---|
| (F) Arrangements With Local Authorities: | | | |
| 1. Has the facility made the following arrangements: | | | |
| a. Arrangements to familiarize police, fire dept., and emergency response team with H.W. operations (265.37a.1)? | ✓ | | ONLY ONE LETTER OF TRANSMITTAL AND NO REPLIES (AGREEMENT OR REFUSAL) COULD BE PRODUCED AT TIME OF INSPECTION. COPIES OF LETTERS SUBMITTED W/ REVISED CONTINGENCY PLAN. SEE ATTACHMENT #6 |
| b. Agreements designating primary emergency authority (265.37a.2)? | ✓ | | |
| c. Agreements with State emergency response teams, contractors and equipment suppliers (265.37a.3)? | | ✓ | NOT PRODUCED. |
| d. Arrangements to familiarize local hospitals with the properties of H.W. and the types of potential injuries and illnesses from exposure to H.W. (265.37a.4)? | ✓ | | |
| 2. Did the facility document in the operating record any refusal by State or local authorities to enter into such arrangements (265.37b)? | | | N/A |

## V. Contingency Plan and Emergency Procedures: (Part 265 Subpart D)

| | Yes | No | Comments |
|---|---|---|---|
| (A) Does the facility have a contingency plan (265.51a)? | ✓ | | SEE EMERGENCY & DISASTER PLAN IN ENVIRONMENTAL PROTECTION MANUAL ATTACHMENT #6 |
| (B) Content Of Contingency Plan: | | | |
| 1. Does the plan describe actions personnel must take to comply with §§ 265.51 & 265.56 in response to fires, explosions, or unplanned releases of H.W. (265.52a)? | ✓ | | |
| 2. Does the plan describe arrangements agreed by police, fire dept., hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to § 265.37 (265.52c)? | ✓ | | |
| 3. Does the Plan list names, addresses, and phone numbers (office & home) of all persons qualified to act as emergency coordinators (265.52d)? (list in order of responsibility) | | ✓ | ADDRESSES NOT INCLUDED. 6 PEOPLE W/ HOME PHONES ARE LISTED. |
| 4. Does the plan list all emergency equipment including the location and physical description of each item on the list and a brief outline of its capability (265.52e)? | ✓ | | |
| 5. Does the plan include an evacuation plan for personnel and a description of signals to begin evacuation, evacuation routes and alternate routes (265.52f)? | | ✓ | DETAILED RADIO SIGNALS (CODE 33), NO ROUTES DETAILED. |
| (C) Copies of Contingency Plan: | | | |
| 1. Is the plan maintained at the facility (265.53a)? | ✓ | | |
| 2. Has the plan been submitted to all local emergency organizations (265.53b)? | ✓ | | 7/1/85. SEE ATTACHMENT #6 LETTERS |

V. Contingency Plan and Emergency Procedures: - Con't.
(Part 265 Subpart D)

| | Yes | No | Comments |
|---|---|---|---|
| (D) Amendment Of Contingency Plan: | | | |
| 1. Has the plan been reviewed and immediately amended when required (265.54)? | ✓ | | LAST AMENDED 4/85 |
| (E) Emergency Coordinator: | | | |
| 1. Is the coordinator familiar with all aspects of site operation and emergency procedures (265.55)? | ✓ | | |
| 2. Does the coordinator have authority to carry out the contingency plan (265.55)? | ✓ | | |
| (F) Emergency Procedures: | | | |
| 1. If an emergency situation has occurred at this facility, has the emergency coordinator followed the emergency procedures listed in § 265.56 (265.56)? | | | N/A |

## III. The Manifest: (Part 262 Subpart B)

NOTE: TSD checklist p.14, "USE OF MANIFEST System" has been replaced by this page from GENERATOR-ONLY list, since facility does not accept any off-site wastes.

| | Yes | No | Comments |
|---|---|---|---|
| 1. Does the generator prepare a manifest before transporting H.W. off-site (262.20a)? | ✓ | | |
| 2. Does the generator designate on the manifest one facility which is permitted to handle H.W. (262.20b)? | | ✓ | SEE Exhibit "C" of ATTACHMENT # 5, #'s 8264545, 8264546, 8264547, 8264548, 8264549. |
| 3. Does the manifest contain the following information: | | | MANIFESTS INCLUDED IN '84-'85 ANNUAL REPORT OF 2/20/85 - ATTACHMENT 9 DO[redacted] HAVE FACILITY LISTED. |
| a. A manifest document number (262.21a.1)? | ✓ | | |
| b. Generator's name, mailing address, telephone number and EPA ID No. (262.21a.2)? | ✓ | | |
| c. Name and EPA ID No. of each transporter (262.21a.3)? | ✓ | | |
| d. Name, address and EPA ID No. of the designated facility and alternate facility (262.21a.4)? | | ✓ | SEE #2, ABOVE |
| e. Description of the wastes (e.g., proper DOT shipping name, hazard class and identification number (262.21a.5)? | ✓ | | |
| f. Total quantity of each H.W. by units of weight or volume, and the type & number of containers (262.21a.6)? | ✓ | | |
| g. The required certification (262.21b)? | ✓ | | |
| 4. Does the manifest consist of a sufficient number of copies (262.22)? | ✓ | | |
| 5. Does the generator sign the manifest certification (262.23a.1)? | ✓ | | |
| 6. Does the generator obtain signature of initial transporter and date of acceptance on manifest (262.23a.2)? | ✓ | | MANIFEST #83555316 OF 6/5/84, in "C" OF APPENDIX # 5, SHOWS TRANSPORTER RECEIVING ON 6/6/84 MATERIAL DISPOSED OF ON 6/5/84... |
| 7. Does the generator retain one copy of the manifest (262.23a.3)? | ✓ | | |
| 8. Does the generator give the transporter remaining copies of manifest (262.23b)? | | | NOT INSPECTED |

NO such section

VI. Manifest System, Recordkeeping, and Reporting: - Con't
(Part 265 Subpart E)

| | Yes | No | Comments |
|---|---|---|---|
| 2. Does the operating record contain the following information: | | | |
| a. A description and the quantity of each waste received (265.73b.1)? | ___ | ___ | N/A WASTE GENERATED & TREATED ON SITE, NO OFF-SITE WASTES ARE ACCEPTED |
| b. The method(s) and date(s) of its treatment, storage or disposal as required by Appendix I (265.73b.1)? | ___ | ✓ | SPECIFIC DATES COULD NOT BE PRODUCED |
| c. The location of each waste within the facility and the quantity at each location (265.73b.2)? (This information must include cross-references to specific manifest numbers.) | ___ | ✓ | USING THE OPERATING RECORDS, THE QUANTITY AND ACCUMULATION DATE OF WASTE AT EACH MANAGEMENT UNIT COULD NOT BE STATED DURING INSPECTION |
| d. For disposal facilities, the location and quantity of each waste is recorded on a map or diagram of each cell or disposal area (265.73b.2)? | ___ | ___ | N/A |
| e. Records and results of all waste analysis and trial tests (265.73b.3)? | ___ | ✓ | RECORDS AND RESULTS PER EITHER W.A.P. COULD ONLY BE PARTIALLY PRODUCED. SEE ATTACHMENTS #3, "A" ATTACHMENT #5 |
| f. Reports detailing all incidents that required implementation of the contingency plan (265.73b.4)? | ___ | ~~✓~~ | N/A |
| g. Records and results of operator inspections (265.73b.5)? | ✓ | ___ | |
| h. Monitoring data (265.73b.6)? | ___ | ___ | N/A |
| i. All closure and post-closure costs as applicable (265.73b.7)? | ✓ | ___ | |
| (D) Availability, Retention, Disposition Of Records: | | | |
| 1. Are all records including plans available for inspection (265.74a)? | ___ | ✓ | SEE NARRATIVE |
| 2. Have copies of records of H.W. disposal locations and quantities under § 265.73b.2 been submitted to the RA and local land authority upon closure of the facility (265.74c)? | ___ | ___ | N/A |

VI. Manifest System, Recordkeeping, and Reporting: - Con't.
(Part 265 Subpart E)

| | Yes | No | Comments |
|---|---|---|---|
| (E) Biennial Report: | | | |
| 1. Has the facility submitted a biennial report ~~to the RA~~ by March 1 of each even numbered year (265.75)? | ✓ | | TRANSMITTED to STATE. COPIES OF 1983 and 1984 REPORT IN ATTACHMENT #9. |
| 2. Was the report submitted on EPA form 8700-13B and cover facility activities during the previous calendar year ( 265.75)? | | | N/A |
| 3. Does the report include the following infromation: (265.75) | | | |
| a. EPA identification number, name and address of the facility? | ✓ | | |
| b. Calendar year covered by report? | ✓ | | |
| c. For off-site facilities, the EPA identification number of each generator? | | | N/A |
| d. Description and quantity of each H.W. received and, for off-site facilities, the EPA identification number of each generator listed with this information? | ✓ | | |
| e. Methods of treatment, storage, or disposal for each H.W.? | ✓ | | |
| f. Monitoring data under § 265.94a.2.ii and iii and b.2 ? | | | |
| g. Most recent closure and post-closure cost estimates? | ✓ | | DATED JUNE 23, 1982 |
| h. Required certification? | ✓ | | DATED JUNE 25, 1982 |

VI. Manifest System, Recordkeeping, and Reporting: - Con't
(Part 265 Subpart E)

| | Yes | No | Comments |
|---|---|---|---|
| (F) Unmanifested Waste Report: | | | |
| 1. For a facility that has accepted a H.W. from an off-site source without an accompanying manifest, was a report containing the required information submitted to the RA within 15 days after receiving the H.W. (265.76a-g)? | ___ | ___ | N/A |
| (G) Additional Reports: | | | |
| 1. Has the facility reported to the RA: (265.77) | | | |
| a. Releases, fires and explosions? | ___ | ___ | N/A |
| b. Ground-water contamination and monitoring data? | ___ | ___ | N/A |
| c. Facility closure? | ___ | ___ | N/A |

## VII. Ground-Water Monitoring: (Part 265 Subpart F)

| | Yes | No | Comments |
|---|---|---|---|
| (A) Has a ground-water monitoring program (capable of determining the facility's impact on the quality of ground-water in the uppermost aquifer underlying the facility) been implemented (265.90a)? | | ✓ | COULD NOT BE PRODUCED ON REQUEST. REVISED PART A (ATTACHMENT #2) TOPO MAP & WELL CHART SHOWS NO WELLS ON SITE. FACILITY COULD PRESENT NO WELL DATA OR HYDROGEOLOGIC DATA FOR SITE. |
| (B) Ground-Water Monitoring System: | | | |
| 1. Has at least one monitoring well been installed in the uppermost aquifer hydraulically upgradient from the limit of the waste management area (265.91a.1)? | | | N/A |
| a. Are ground-water samples from the uppermost aquifer representative of background ground-water quality and not affected by the facility? (as ensured by proper well number, locations and depths) (265.91a.1) | | | |
| 2. Have at least three monitoring wells been installed hydraulically downgradient at the limit of the waste management area (265.91a.2)? | | | |
| a. Do well numbers, locations and depths ensure prompt detection of any statistically significant amounts of H.W. or H.W. constituents that migrate from the waste management area to the uppermost aquifer (265.91a.2)? | | | |
| 3. Have the locations of the waste management areas been verified to conform with information in the ground-water program (265.91b)? | | | |
| a. If the facility contains multiple waste management components, is each component adequately monitored (265.91 b & b.2)? | | | |

~~WSH~~ GROUND-WATER monitoring checklist PAGES 19-27 DELETED.

## VIII. Closure and Post-Closure:
(Part 265 Subpart G)

| | Yes | No | Comments |
|---|---|---|---|
| (A) Closure Plan: | | | |
| 1. Does the facility have a closure plan (265.112a)? | ✓ | | DATED 2/20/85, EFFECTIVE 3/1/85 SEE ATTACHMENT #9 |
| 2. Does the plan identify the steps necessary to completely or partially close the facility at any point during its intended operating life and to completely close at the end of its intended operating life (265.112a)? | ✓ | | |
| 3. Do the steps to close in the plan include: (265.112a) | | | |
| a. Pre-treatment of H.W.? | ✓ | | |
| b. Treatment of H.W.? | ✓ | | |
| c. Removal of H.W. from process units? | ✓ | | |
| d. Disposal of H.W.? | ✓ | | |
| e. Decontamination of equipment and structures? | ✓ | | NO specifics... "A general plan for decontamination of buildings and equipment shall be developed..." C.P. p.3(c). |
| f. Scheduled inspections for closure certification purposes? | | ✓ | |
| 3. Does the description of how and when the facility will be closed include the following elements: | | | |
| a. Maximum extent of operation which will be unclosed during the life of the facility (265.112a.1)? | | ✓ | |
| For facilities that have designated H.W. management areas inactive prior to Nov. 19, 1980, are records available documenting the cessation of activity or final closure? | | | N/A |
| Was a Notification of Hazardous Waste Site submitted to EPA as required by § 103c of CERCLA ? | | | N/A |

VIII. Closure and Post-Closure: - Continued
(Part 265 Subpart G)

| | Yes | No | Comments |
|---|---|---|---|
| b. Estimate of the maximum inventory of H.W. in storage and in treatment at any time during the life of the facility (265.112a.2)? | | ✓ | NO INVENTORY IN PLAN |
| c. Does the inventory include the maximum amount of on-site: | | | |
| H.W. in surface impoundments? | | ✓ | |
| H.W. in tanks? | | ✓ | |
| H.W. in piles? | | | N/A |
| H.W. in containers? | | ✓ | |
| H.W. in drainage pits or sumps? | | | N/A |
| Contaminated soil from spills or leaks? | | ✓ | |
| Contaminated soils and liners from non-disposal impoundments? | | | N/A |
| Contaminated soils from land treatment fields? | | | N/A |
| Decontamination residues? | | ✓ | |
| Process residues? | | ✓ | |
| Other (specify)? | | | |
| d. Decontamination procedures including: (265.112a.3) | | | |
| A list of equipment, containers, structures requiring decontamination? | ✓ | | |
| Sampling and analytical methods for determining whether soil contamination or decontamination residues are H.W.? | | ✓ | |
| Testing criteria for determining adequacy of clean-up? | | ✓ | |
| Methods of treatment or disposal of contaminated soils and residues? | ✓ | | |

VIII. Closure and Post-Closure: - Continued
(Part 265 Subpart G)

| | Yes | No | Comments |
|---|---|---|---|
| e. Estimate of the expected year of closure (265.112a.4)? | ___ | ✓ | ___ |
| f. Schedule for final closure activities (265.112a.4)? | ✓ | ___ | 90 DAYS prior to closure. C.P. p.1 (B). only noted. |
| g. Does the schedule include: | | | |
| Total time required to close? | ___ | ✓ | Plan for closure notes 90 days Prior to closure activities for planning |
| Time required for intervening closure activities? (e.g., Time required for H.W. treatment, disposal, decontamination, and certification inspections.) | ___ | ✓ | and Plan notes 90 days after closure for certification and reporting. No actual time or schedule noted for closure itself. |
| 4. Has the facility amended the plan whenever changes in operating practice or process design affect the plan or there is a change in the expected year of closure (265.112b)? (Plan must be amended within 60 days of the changes.) | ✓ | ___ | ___ |
| 5. Has the facility submitted a closure plan to the RA at least 180 days before the date they expect to begin closure (265.112c)? | ___ | ___ | N/A |
| (B) Time Allowed For Closure: | | | |
| 1. Does the schedule for final closure allow for the following: | | | |
| a. Treatment, removal, or disposal of H.W. within 90 days after receipt of final volume of H.W. or after approval of closure plan (265.113a)? | ✓ | ___ | ___ |
| b. Completion of closure plan activities within 180 days after receipt of final volume of H.W. or after approval of closure plan (265.113b)? | ✓ | ___ | ___ |

VIII. Closure and Post-Closure: - Continued
(Part 265 Subpart G)

| | Yes | No | Comments |
|---|---|---|---|
| (C) Disposal And Decontamination Of Equipment: | | | |
| 1. For facilities that have completed closure activities, has all equipment and structures been properly disposed of or decontaminated by removing all H.W. and contaminated residues (265.114)? | __ | __ | N/A |
| (D) Certification Of Closure: | | | |
| 1. For facilities that have completed closure activities, has a certification by owner/operator and an independent registered professional engineer been submitted to the RA (265.115)? | __ | ✓ | SEE NARRATIVE |
| (E) Partial Closure: | | | |
| 1. Does the facility plan to close discreet regulated H.W. manage-units during the intended operating life? If "Yes" complete compliance form for partial closure. | ✓ | __ | THREE H.W. SURFACE IMPOUNDMENTS ARE ALREADY CLOSED. |

VIII. Closure and Post-Closure: - Continued
(Part 265 Subpart G)

Compliance Form For Partial Closure

| | Yes | No | Comments |
|---|---|---|---|
| (E) Partial Closure: | | | |
| 1. Does the closure plan describe how the facility will be partially closed (265.112a.1)? | ___ | ✓ | THREE AREAS OF H.W. STORAGE ARE ALREADY CLOSED OR OUT OF COMMISSION FOR OVER 90 DAYS. |
| 2. Does the plan describe the size of areas partially closed? | ___ | ✓ | |
| 3. Does the plan describe the procedures for partial closure? | ___ | ✓ | |
| 4. Does the plan address maintenance activities, including: (265.112a.1) | | | |
| a. Visual inspections? | ___ | ✓ | |
| b. Ground-water monitoring? | ___ | ✓ | |
| c. Maintaining cover? | ___ | ✓ | |
| d. Maintaining diversion structures? | ___ | ✓ | |
| e. Controlling erosion? | ___ | ✓ | |
| f. Maintaining vegetation? | ___ | ✓ | |
| g. Maintaining site security systems? | ___ | ✓ | |
| h. Leachate collection system? | ___ | ✓ | |
| i. Gas collection system? | ___ | ___ | N/A |
| j. Other (specify)? | ___ | ___ | N/A |
| 5. Does the plan describe the frequencies for each type of maintenance activity (265.112a.1)? | ___ | ✓ | |
| 6. Does the plan describe when the facility will be partially closed (265.112a.1)? | ___ | ✓ | |
| 7. Does the schedule for partial closure include: (265.112a.1) | | | |
| a. Date(s) of partial closure(s)? | ___ | ✓ | |
| b. Total time required for each partial closure? | ___ | ✓ | |
| c. Time required for intervening partial closure activities? (e.g., time required for waste removal, stabilization, treatment, disposal; placement of cover; vegetation; decontamination; certification.) | ___ | ✓ | |

CHECKLIST SECTION VIII (F), POST-CLOSURE DELETED. SITE IS NOT A DISPOSAL FACILITY (265.110 (b)).
SECTION VIII (G), NOTICE TO LOCAL LAND AUTHORITIES, DELETED. NOT A DISPOSAL FACILITY.

## IX. Financial Requirements:
(Part 265 Subpart H)

| | Yes | No | Comments |
|---|---|---|---|
| (A) Cost Estimate For Closure: | | | |
| 1. Has a written estimate been prepared of the cost of closing the facility (265.142a)? | ✓ | | |
| What is the amount of the closure cost estimate? $ 235,000.00 | | | |
| 2. Does the estimate equal the cost of closure at the point when the extent and manner of the operation would make closure the most expensive (265.142a)? | | | |
| 3. Does the cost estimate cover all the activities in the closure plan (265.142a)? | | | |
| 4. Has the cost estimate been adjusted for inflation within 30 days after each anniversary of the date on which the first cost estimate was prepared (265.142b)? | | ✓ | COVER LETTER TO CLOSURE PLAN DATED 2/20/85 states it is to "REFLECT CURRENT EVALUATION OF ~~TOTAL IS ID.~~ COSTS. RELATED TO CLOSURE". TOTAL, OF $235,000, was same as 6/23/8 ESTIMATE. |
| 5. Was the adjustment made by using an inflation factor derived from the Annual Implicit Price Deflator for Gross National Product as published by the U.S. Dept. of Commerce in its "Survey of Current Business" (265.142b)? | | N/A | |

Latest Annual Deflator = _____

Previous Annual Deflator = _____

Inflation Factor = _____ (latest deflator/previous deflator)

Current Cost Adjustment = $_____ (latest adjusted estimate x inflation factor)

IX. Financial Requirements: - Continued
(Part 265 Subpart H)

| | Yes | No | Comments |
|---|---|---|---|
| 6. Was the cost estimate revised whenever a change in the closure plan increased the cost of closure (265.142c)? (Revised estimate must be adjusted for inflation.) | ___ | ___ | NOT ~~APPLICA~~ INSPECTED. NO PREVIOUS CLOSURE PLAN IN EPA FILES - DELEGATED to STATE. |
| 7. Are the following kept at the facility during the operating life of the facility: (265.142d) | | | |
| a. Latest closure cost estimate? | ✓ | ___ | |
| b. Latest adjusted closure cost estimate? | ~~N/A~~ | ___ | N/A NOT ADJUSTED. |
| 8. Is there written documentation supporting the closure cost estimate? | ✓ | ___ | VERY briefly in closure PLAN p. 4, PARAGRAPH IV B. |
| a. Workups from labor, material and equipment requirements? | ___ | ✓ | |
| b. Contractor estimates and bids? | ___ | ✓ | |
| c. Figures derived from cost estimating handbooks? | ___ | ✓ | |
| d. Figures derived from operator experience? | ✓ | ___ | |
| 9. Does the estimate accurately reflect the cost of closure for similar types of facilities? | ___ | ___ | NOT INSPECTED |

FINANCIAL REQUIREMENTS, PART IX (B), pp's 37+38, POST-CLOSURE CARE COST ESTIMATES, DELETED. FACILITY DOES NOT DISPOSE (265.144a)

## X. Use And Management Of Containers:
(Part 265 Subpart I)

| | Yes | No | Comments |
|---|---|---|---|
| 1. Does the facility transfer H.W. from containers not in good condition or leaking to containers in good condition (265.171)? | ✓ | | 55-gal DRUMS USED IN 6 SATELLITE STATIONS<br>NO LEAKING DRUMS OBSERVED |
| 2. Are containers compatible with H.W. stored in them (265.172)? | ✓ | | |
| 3. Are containers stored closed (265.173a)? | ✓ | | OPEN DRUM EVAPORATION USED IN BURN BUNKER AREA AS WASTE REDUCTION TECHNIQUE |
| 4. Are containers managed to prevent rupture or leakage (265.173b)? | ✓ | | |
| 5. Are containers inspected weekly for leaks and deterioration (265.174)? | | ✓ | NO WRITTEN INSPECTION SCHEDULE COULD BE PRODUCED ON REQUEST |
| 6. Are ignitable or reactive wastes stored at least 50 feet from the facility's property line (265.176)? | ✓ | | WASTE AREAS APPEAR VERY REMOT FROM SITE PERIMETER |
| 7. Are incompatible wastes stored in separate containers (265.177a)? | ✓ | | |
| 8. Are H.W. not placed in unwashed containers that previously held an incompatible waste or material (265.177b)? | ✓ | | |
| 9. Are containers holding a H.W. that is incompatible with any waste or materials stored nearby in other containers, piles, open tanks, or surface impoundments separated from the incompatibles by suffecient distance or protected by means of a dike, berm, wall, or other device (265.177c)? | | | N/A WASTE DISPOSAL AREAS NOT ADJACENT TO EACH OTHER. |
| 10. Are containers that are not empty managed as a H.W. (261.7a.2)? | ✓ | | |
| 11. For a container to be considered empty the facility must ensure that: | | | |
| a. No more than one inch of residue remains on bottom of container or inner lining (261.7b.1)? | ✓ | | |
| b. Containers that held an acutely H.W. are tripled rinsed using a solvent capable of removing the contents (261.7b.3)? | | | NOT INSPECTED<br>SEE NARRATIVE FOR DISCUSSION OF DRUMS MIS-LABELLED, PHOTOS |

## XI. Tanks:
(Part 265 Subpart J)

| | Yes | No | Comments |
|---|---|---|---|
| 1. Is the treatment or storage of H.W. in tanks conducted so that it does not: (265.192a) | | | |
| a. Generate extreme heat or pressure; fire or explosion; or violent reaction? | ✓ | | |
| b. Produce uncontrolled toxic or flammable mists, fumes, dusts, or gases? | ✓ | | |
| c. Damage the structural integrity of the tank? | | | LINER IN TANK #3 WAS PULLED FOR SERVICE - CAUSE OF PROBLEM NOT YET ASSERTAINED. SEE TANK INSPECTION LOG, ATTACHMENT #5, "Exhibit B", LETTER DATED 8/2/85, P.4, ATTACHMENT #5 |
| 2. Are H.W. or treatment reagents placed in a tank so that they do not cause the tank or its inner liner to rupture, leak, corrode, or otherwise fail (265.192b)? | | | |
| 3. Do uncovered tanks have at least 2 feet of freeboard, or dikes, or other containment features (265.192c)? | | | N/A |
| 4. Where H.W. is continuously fed into a tank, is the tank equipped with a waste feed cutoff system or by-pass system to a stand-by tank (265.192d)? | | | N/A |
| 5. Does the facility conduct waste analysis and trial treatment or storage tests, or have they obtained written documentation on similar storage or treatment of similar waste under similar operating conditions before the tank is used to: | | | |
| a. Chemically treat or store a H.W. which is substantially different from waste previously treated or stored in the tank (265.193a.1)? | | | N/A |
| b. Chemically treat H.W. with a substantially different process than was previously used (265.193a.2)? | ✓ | | TANKS USED FOR TRIAL BIODEGRADATION OF LEAD AZIDE. TRIALS OF LINER MATERIAL IN PARAGRAPH #4, P.4 OF LETTER DATED 8/2/85 in ~~APPENDIX #~~ ATTACHMENT #5 |

XI. Tanks: - Continued
(Part 265 Subpart J)

| | Yes | No | Comments |
|---|---|---|---|
| 6. Are daily and weekly inspections done for the following: | | | |
| a. Discharge control equipment e.g., feed cutoff, bypass and drainage systems (Daily) (265.194a.1)? | ___ | ✓ | TANK INSPECTION LOG SHOWS INSPECTIONS NOT PERFORMED DAILY |
| b. Data gathered from monitoring equipment e.g., pressure and temperature gauges (Daily) (265.194a.2)? | ___ | ✓ | |
| ? c. Level of waste in uncovered tanks (Daily) (265.194a.3)? regs don't say uncovered w | ___ | ___ | N/A |
| d. Construction materials of tank e.g., corrosion, leaking fixtures or seams (Weekly) (265.194a.4)? | ___ | ✓ | MORE THAN 7 DAYS ELAPSED BETWEEN LOGGED INSPECTIONS |
| e. Discharge confinement structures e.g., dikes (Weekly) (265.194a.5)? | ___ | ✓ | |
| 7. At closure, are all H.W. and residues removed from tanks and associated equipment and structures (265.197)? | ___ | ___ | N/A |
| 8. Are ignitable or reactive waste treated, rendered, or mixed before or immediately after placement in a tank so that the resulting waste no longer meets the definition of ignitability or reactivity (265.198a.1)? or | ___ | ___ | |
| 9. Are ignitable or reactive waste stored or treated in such a way that it is protected from conditions which may cause the waste to ignite or react (265.198a.2)? | ✓ | ___ | |
| 10. Does the facility comply with the buffer zone requirements for covered tanks containing ignitable or reactive wastes specified in tables 2-1 through 2-6 of the National Fire Protection Association's "Flammable and Combustible Liquids Code" (1977 or 1981) (265.198b)? | ✓ | ___ | |
| 11. Are incompatible wastes stored in separate tanks (265.199a)? | ___ | ___ | N/A |
| 12. Are H.W. not placed in unwashed tanks that previously held an incompatible waste or material (265.199b)? | ___ | ___ | N/A |

## XII. Surface Impoundments: (Part 265 Subpart K)

| | Yes | No | Comments |
|---|---|---|---|
| 1. Do impoundments have at least 2 feet of freeboard (265.222)? | ___ | ___ | N/A NO ACTIVE SURFACE IMPOUNDMENTS. |
| 2. Do earthen dikes have protective cover to minimize wind and water erosion and to preserve their structural integrity (265.223)? | ___ | ___ | ___ |
| 3. Does the facility conduct waste analysis and trial treatment tests, or have they obtained written documentation on similar treatment of similar waste under similar opreating conditions before the impoundment is is used to: | | | |
| a. Chemically treat a H.W. which is substantially different from waste previously treated in the impoundment (265.225a.1)? | ___ | ___ | ___ |
| b. Chemically treat H.W. with a substantially different process than was previously used (265.225a.2)? | ___ | ___ | ___ |
| 4. Is the treatment of H.W. in impoundments conducted so that it does not: (265.225a.2) | | | |
| a. Generate extreme heat or pressure; fire or explosion; or violent reaction? | ___ | ___ | ___ |
| b. Produce uncontrolled toxic or flammable mists, fumes, dusts, or gases? | ___ | ___ | ___ |
| c. Damage the structural integrity of the liner? | ___ | ___ | ___ |
| d. Threaten human health or the environment? | ___ | ___ | ___ |
| 5. Is the freeboard level inspected at least daily (265.226a.1)? | ___ | ___ | ___ |
| 6. Are the dikes inspected weekly for evidence of leaks, deterioration or failure (265.226a.2)? | ___ | ___ | ___ |